## REMARKS/ARGUMENTS

Claims 8-12, 15-19, 21-41, 44, 45 and 47-50 are pending in this application. By this Amendment, claims 8-12, 15-17, 19, 21-23, 25, 28-30, 32-34, 36-41, 44, 45, 49 and 50 are amended, and claims 42, 43 and 46 are canceled without prejudice or disclaimer. Support for the claims can be found throughout the specification, including the original claims and the drawings. Withdrawal of the rejections in view of the above amendments and the following remarks is respectfully requested.

### I.     Claims 8-12, 17-19, 23-38, 42-45 and 47-50

The Office Action rejects claims 8-12, 17-19, 23-38, 42-45 and 47-50 under 35 U.S.C. §103(a) over U.S. Patent No. 6,912,293 to Korobkin (hereinafter "Korobkin"). Claims 42 and 43 are canceled. The rejection, in so far as it applies to the remaining claims, is respectfully traversed.

#### A.     Independent Claim 8

Independent claim 8 recites a method for operating an air conditioning system selling system, comprising, _inter alia_, simulating a 3D installation of an air conditioning system in a venue in which the air conditioning system is to be installed and displaying the simulated 3D installation on the web page, wherein a 3D image of the venue is generated based on a purpose of the building, an inside volume, an estimated number of persons in a room, an inside material, a type of ventilation system, an internal structure, or a floor number on which the product is to be installed. Korobkin neither discloses nor suggests at least such features, or the claimed

combination of features.

Korobkin discloses a photogrammetric media processing engine (MPE) 11 coupled to a transmission network 10 (i.e., the Internet). A user may upload 2D digital images 24 and/or 3D geometric models 23 to the network 10, or download network digital images 21 and/or network 3D models 20 from the network 10. From 2D digital images, the system generates scene graphs which define a particular image through a series of nodes and links, as shown in Figures 3-13 of Korobkin.

In a typical application of Korobkin's system, a customer uploads a 2D digital image of a room to be furnished (a 2D digital image 24) to a particular merchant's website through the network 10. The customer then shops for and selects furniture and other decorative items the customer is considering for placement in the room from 2D digital images (network digital images 21) of those items posted by the merchant. The system maps the 2D digital images of the selected items into the 2D digital image of the room to form a "mosaic" image from which the system generates a 3D model. Essentially, the system generates a snapshot of what the room would look like with the selected furniture and decorative items place in it, to assist in the customer's selection of these items for purchase.

Korobkin's system is directed to the selection, placement and movement of simple furniture and decorative items in a room. Korobkin neither discloses nor suggests a method for operating an air conditioning system selling system, as recited in independent claim 8. More specifically, the placement of these furniture items in the room is basically an issue of fit and

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appearance. This modeling of placement of the furniture items in the room does not require

complex interface with other systems in the room (such as, for example, electrical, plumbing,

ventilation, and the like), and does not require adjustment for occupancy, location within a

building, or the structural components of the building.

In contrast, the method recited in independent claim 8 is directed to a selling system for

an air conditioning system. As would be well understood by one of ordinary skill in the art,

selecting and modeling an air conditioning system and simulating an installation of a selected air

conditioning system in a particular venue requires access to extensive specifications regarding the

capabilities, capacities, and operating requirements of each of the available systems and how

those elements interface with heating/cooling requirements for a particular venue, which are in

turn effected by a purpose, estimated occupancy, location, and existing infrastructure and

material of the venue. The significant limitations of Korobkin's system render it incapable of

adequately taking these elements into account when either selecting a system or simulating the

installation of such a system in a particular venue to ensure adequate heating/cooling capacity

for a given size, location, purpose and occupancy. Thus, it is respectfully submitted that

Korobkin neither discloses nor suggests a method for operating an air conditioning selling

system as recited in independent claim 8.

Further, the Office Action asserts that Korobkin discloses at column 30, lines 11-15 that

a user may place a wall for a left side of a room. However, this portion of Korobkin's disclosure

is directed at the customer's ability to <u>designate</u> certain portion(s) of the image which has been

provided to the system as a <u>point of reference</u> for the remainder of the room (see, for example,

column 30, lines 14-20 of Korobkin). Thus, for example, by designating a particular spot in the

room as a point of reference in this manner, the user may judge relative distances between

furniture items and other such characteristics in the furnished room. However, the image of the

room is still provided by the user, and not generated by Korobkin's system. This disclosure by

Korobkin in no way discloses or suggests that the system allows the user to actually place a wall

in a desired location, nor that the system is capable of generating an image of a venue based on

any of the recited parameters.

For all of the above reasons, it is respectfully submitted that independent claim 8 is

allowable over Korobkin, and thus the rejection of independent claim 8 under 35 U.S.C. §103(a)

over Korobkin should be withdrawn. Dependent claims 9-12, 17-19, 23-28, 44, 45, 47 and 48

are allowable at least for the reasons set forth above with respect to independent claim 8, from

which they depend, as well as for their added features.

## B.    Independent claim 49

Independent claim 49 recites a method for selling an air conditioning system, comprising,

*inter alia*, receiving an appropriate classification from a plurality of classifications based on a

purpose of access and a level of expertise, searching for a required air conditioning system,

providing a first set of information related to the required air conditioning system for an

individual, non-expert classification, receiving additional information related to installation

requirements for the required air conditioning system including drawings of a building into

which the required air conditioning system is to be installed, and providing a second set of information related to the required air conditioning system for an expert classification, and simulating a three dimensional (3D) installation of the required air conditioning system and displaying the simulated installation on a web page. As set forth above, Korobkin neither discloses nor suggests at least such features, or the claimed combination of features.

Applicant respectfully disagrees with the assertion in the Office Action that Korobkin's disclosure of the use of the system by novices and professionals at column 6, lines 8-26 is comparable to providing first and second sets of information, as recited in independent claim 49. Rather, this portion of Korobkin is directed at the way in which a 2D image may be mapped into a 3D model, and the advantages this capability may provide. Korobkin's system is limited to simply receiving input from an unknown, unclassified source and generating a 3D model based only on the images it is given, without discrimination between levels of expertise. Thus, Korobkin's system provides only one set of information, regardless of the source of the incoming information used to generate the model. Korobkin neither discloses nor suggests that the system is capable of providing first and second sets of information based on a classification level, nor continuing to reprocess the information until a purchase order is placed, as recited in independent claim 49. It is further submitted that it would not have been an obvious modification of Korobkin's system to extend classification levels based on purpose of access and level of expertise. Rather, it is respectfully submitted that Korobkin teaches away from such a modification, as Korobkin clearly discloses that one purpose of his system is to provide this 3D

modeling capability to the <u>average</u> shopper to simplify online shopping experiences.

Further, as set forth above, Korobkin's system is clearly directed at the modeling and simulation of simple furniture and decorative items in a room. Korobkin neither discloses nor suggests that the disclosed system and method could or should be modified to accommodate the significantly more complex aspects of selecting, modeling and simulating installation of air conditioning systems in various venues.

For all of the above stated reasons, it is respectfully submitted that independent claim 49 is allowable over Korobkin, and thus the rejection of independent claim 49 under 35 U.S.C. §103(a) over Korobkin should be withdrawn. Dependent claim 50 is allowable at least for the reasons set forth above with respect to independent claim 49, from which it depends, as well as for its added features.

## II.    <u>Claims 15, 16, 21, 22, 39-41 and 46</u>

The Office Action rejects claims 39-41 under 35 U.S.C. §103(a) over Korobkin in view of U.S. Patent No. 7,043,457 to Hansen (hereinafter "Hansen"). The Office Action also rejects claims 15, 16, 21, 22 and 46 under 35 U.S.C. §103(a) over Korobkin in view of U.S. Patent No. 6,390,063 to Obata et al. (hereinafter "Obata"). Claim 46 is canceled. These rejections, in so far as they apply to the remaining claims, are respectfully traversed.

Dependent claims 15, 16, 21, 22 and 39-41 are allowable over Korobkin at least for the reasons set forth above with respect to independent claim 8, from which they depend, as well as for their added features. Further, Hansen is merely cited as allegedly teaching the use of client

information which includes type, quantity, and delivery date(s) of products, and Obata is merely cited as allegedly teaching receiving allowable load information with corresponding venue information, and selecting and displaying an appropriate product. Thus, Hansen and Obata each fail to overcome the deficiencies of Korobkin. Accordingly, it is respectfully submitted that claims 15, 16, 21, 22 and 39-41 are allowable over the respective applied combinations, and thus the rejection of claims 15, 16, 21, 22 and 39-41 under 35 U.S.C. §103(a) should be withdrawn.

### III. Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned, **JOANNA K. MASON**, at the telephone number listed below.
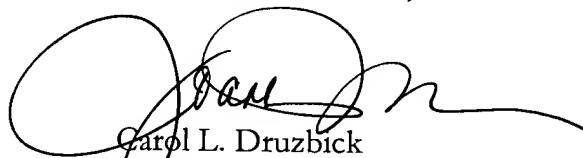
To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,
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